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March 9, 2016

VIA ECF

Hon. Cathy L. Waldor, U.S.M.J.
United States District Court
District of New Jersey
50 Walnut Street
Newark, New Jersey 07102

**Re: United States of America v. United Continental Holdings, Inc., et al.,
Civil Action No. 15-cv-07992 (WHW) (CLW)**

Dear Judge Waldor:

This Firm, along with Crowell & Moring LLP, represents Defendant United Continental Holdings, Inc. ("United") in the above-captioned matter. We have conferred with Plaintiff United States of America and Defendant Delta Air Lines, Inc. On behalf of the parties, we write to respectfully request a short extension of the current fact discovery deadline to April 8, 2016, for the limited purpose of permitting the parties to take depositions that could not be accomplished during the current discovery period.

If Your Honor permits the parties to take the depositions as requested, the parties also request that Your Honor modify the deadlines for (i) serving final trial witness lists to April 8, 2016, to provide the parties with an opportunity to assess and possibly include the various witnesses on the final witness list, and (ii) serving initial expert witness disclosures to April 15, 2016 to provide the parties' experts with an opportunity to incorporate any testimony into their respective reports. These modest modifications will not otherwise affect the case schedule.

If this joint request meets with Your Honor's approval, we kindly ask that this letter be "SO ORDERED" and entered on the Court's docket. We thank the Court for its courtesies and consideration. We are available to answer any questions that Your Honor may have regarding this matter.

SO ORDERED

s/Cathy L. Waldor

Cathy L. Waldor, U.S.M.J.

Date: 3/10/16

Respectfully,

s/ Justin T. Quinn
Justin T. Quinn